

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>In Re: CASSANDRA SHERESE CAREY a/k/a Cassandra S. Carey a/k/a Cassandra Carey Debtor(s)</p> <p>Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust Movant vs. Cassandra Sherese Carey aka Cassandra S. Carey a/k/a Cassandra Carey Debtor Gerard A. Carey, Sr. Frederick L. Reigle, Trustee Additional Respondents</p>	<p>Chapter 13 Bankruptcy Number  15-13763-ref  11 U.S.C. § 362 and §1301</p>
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**ANSWER TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY, FSB, D/B/A  
CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR PRETIUM MORTGAGE  
ACQUISITION TRUST FOR RELIEF FROM THE AUTOMATIC STAY UNDER § 362 AND  
§1301**

Debtor, Cassandra Sherese Carey, by and through her counsel, William Hronis, Esquire files this Answer to the Motion of Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually, but as Trustee for Pretium Mortgage Acquisition Trust for Relief from the Automatic Stay under §362 and §1301 as follows:

1. Admitted.
2. Documentation speaks for itself.
3. Admitted.
4. Admitted.
5. Objection. The pleading calls for a legal conclusion.

6. Documentation speaks for itself.
7. Admitted in part; Denied in part. It is admitted that the Debtor may have fallen behind on her monthly mortgage payment per the Loan Modification Agreement due to her drastic and unforeseen change in employment status. The Debtor is now in the process of going through the disability route that has drastically interrupted her income. It is denied that the amount is due for failure of Movant to attach and/or provide a payment history for examination.
8. Denied. Specific proof is demanded at the time of hearing.
9. Denied. Specific proof is demanded at the time of hearing.
10. Denied. Specific proof is demanded at the time of hearing.
11. Objection. The pleading calls for a speculative response.

WHEREFORE, Debtor, Cassandra Sherese Carey prays that the Motion of Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually, but as Trustee for Pretium Mortgage Acquisition Trust for Relief from the Automatic Stay under §362 and §1301 be denied; and all other relief that the Court may enter.

Dated: June 8, 2017

/s/William Hronis, Esquire

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Sup. Ct. Id. No. 59550